RESPONSE TO COMMENTS

Draft Engineering Evaluation and Cost Analysis (EE/CA)
AMCO Superfund Site, Oakland, California
Contract No. ES-S9-13-01, Task Order 0007

This document presents OTIE's Response to Comments (RTCs) from the California Department of Toxic Substances Control (DTSC) regarding the above referenced document. Comments were provided to the US EPA in a January 28, 2015 letter from DTSC.

No.	Comment section	Comments and Recommendations	Contractor Response
1	DTSC Lynn Nakashima Comment 1 pp.1	There are a number of typographical errors, missing dates, and incomplete sentences throughout the document which affect the clarity of the text. We assume that these errors will be corrected in the final document.	We have thoroughly reviewed the document and have corrected some typos, missing dates and incomplete sentences.
2	DTSC Lynn Nakashima Comment 2 pp.1	Although the description of ISH or Alternative 4 on page ES-3 states that ISH can be implemented with minimal long term impacts to the existing structures and subsurface utility infrastructure, Section 6 does not include what any of those impacts may be and how they might be mitigated. In addition, the overall protectiveness of public health and the environment does not discuss the potential for impacts to the local community and workers due to fugitive vapor emissions.	The text on page 6-8 states that no negative impacts on utilities and sub-surface structures have been observed where ERH has been applied directly below buildings. EPA will prepare a Health and Safety Plan to cover both workers and the public during the remedial action. The monitoring program will detect fugitive vapors which will trigger an appropriate and immediate response, as required.
3	DTSC Lynn Nakashima Comment 3 pp.1	We suggest that performance objectives (e.g., quantitative, semi-quantitative or qualitative) be included in the EE/CA so that success of the interim action can be evaluated.	For the purposes of the EE/CA and the NTCRA, RAOs are identified per Section 5.2.1. However multiple performance metrics based on mass reduction, soil temperatures and mass removal asymptotes will be developed in the design phase and will be used, in addition to RAOs, to determine when to turn treatment systems off.
4	DTSC Lynn Nakashima Comment 4 pp.2	The site's operational history is described in Section 2.1.2 and includes that in 1989 underground storage tanks (USTs) were likely removed, but the piping network was not. It is our recollection that when US EPA's Emergency Response Team excavated areas of the Site to determine whether USTs were present, concrete backfill was found instead. Is the location of the former USTs within the footprint of the treatment area and if so, would the backfill impact electrical conductivity and impact system performance? In addition, if the existing piping network stays in place, would it act as a preferential pathway for soil vapors?	The potential for preferential pathways will be addressed during the remedial design. It is our understanding that the UST that was removed was located in the treatment area.
5	DTSC Lynn Nakashima Comment 5 pp.2	Figure 6-5 indicates that there is a water line located to the south of the Site. Electrode locations are proposed to the south of the water line. Consider whether the water line could act as a preferential pathway for soil vapors and if measures can and need to be taken to prevent off-site migration of vapors.	The potential for preferential pathways and the potential for offsite migration of vapors will be addressed during the remedial design.
6	DTSC	It is unclear whether Section 2.3 (Source, Nature and Extent of Contamination) considered data collected in 2014 and reported in the RI Addendum (1500 samples from 125 locations). For	The soil data collected during the RI conducted in 2011 and the RI Addendum

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	Lynn Nakashima Comment 6 pp.2	example, Section 2.3.1.3 Soil describes data collected "during limited soil sampling (24) locations conducted for the RI".	prepared in 2014 were considered in this section. The text will be edited accordingly.
7	DTSC Lynn Nakashima Comment 7 pp.2	Table 4-1 Summary of ARARs contains numerous typographical errors and thus it is difficult to review. For example, 22 CCR Section 2520-2521, 22 CCR 66262.11 and 22 CCR Section 6626.34 do not exist. We suggest the citations be checked and corrected. We also suggest adding the following California law and regulation; Health and Safety Code Section 25123.3, Remediation Waste Staging and 8 CCR 5192, Hazardous Waste Operation and Emergency Response.	The text will be edited to reflect the comment.
8	DTSC HERO Comment 1 pp.2	The exposure pathways evaluated do not include the inhalation of indoor air contaminated with vapors intruding indoors from the sub-surface. Instead, vapor intrusion is discussed qualitatively in Section 3.7, and there is no attempt to quantitate the risks and hazards posed by this important exposure pathway. If there is no intent to quantitatively assess the vapor inhalation exposure pathway, the text in Section 3.7 should be revised to state that this is the overriding exposure pathway for the VOCs detected on site, and therefore, the calculation of risk and hazard is likely greatly underestimated in this risk evaluation.	We have edited the text to provide a clearer discussion of the qualitative and quantitative risks associated with vapor intrusion and to emphasize that vapor intrusion is the overriding exposure pathway for VOCs, as well as the major reason for conducting a NTCRA at the Site.
9	DTSC HERO Comment 2 pp.2	The exposure point concentrations, toxicity criteria, and exposure parameters used to calculate the risks and hazards are not presented in this report, and no risk assessment spreadsheets are included. This information must be submitted as part of this report. Otherwise, it is not possible to determine if the exposure and risk calculations were performed properly.	This information is included in the Remedial Investigation (RI) Report and RI Addendum. These documents are included in the Administrative Record for this action and will be available alongside the EE/CA at the public repositories.
10	DTSC HERO Comment 3 pp.3	The section of the report discussing soil contamination should include a table listing the risks/hazards from potential exposure to only semi-volatile and non-volatile chemicals present in the soil at the site and risks/hazards from potential exposure to VOCs in soil. This is necessary in order to identify what fraction of the risks/hazards from potential exposure to soil can be attributed to non-volatile chemicals of concern that will not be affected by a removal action alternative that will address remediation of VOCs only.	The risks/hazards posed by potential exposure to non-VOC residuals in soil will be considered when moving forward with the final phase of the AMCO cleanup.
11	DTSC HERO Comment 4 pp.3	The boundary of the source area evaluated in this risk evaluation should be provided in a figure along with the sample data locations and identification numbers that were used to perform the evaluation. The figure should include the boundary of the site as well, in order to be able to visualize what fraction of the site will be subjected to the proposed NTCRA.	An additional Figure (Figure 2-4, – *Soil Sampling Results and Combined Plume Map January 2014*) will be added to the EE/CA. The new figure will show soil sample locations and VOC concentration levels. The Site boundary and proposed treatment area boundary may be found in Figure 2-2, *Soil Characterization Sampling Grid and Concrete Thickness*.

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12	DTSC HERO Comment 5 pp.3	The San Francisco Regional Water Quality Control Board (SFRWQCB) residential Environmental Screening Levels (ESLs) for groundwater and soil will be the removal action objectives (RAOs) for this removal action as listed in Table 5-1 of this EE/CA. (a) Footnotes should be added to the table, identifying the table designations in the SFRWQCB ESLs Report, and including the proper citation of the ESLs report. (b) The ESLs proposed for groundwater represent concentrations protective of the vapor intrusion pathway (Table E-1 Groundwater Screening Levels for Evaluation of Potential Vapor Intrusion, SFRWQCB, December 2013). The HERO previously reviewed the model used by the SFRWQCB to develop these ESLs and concluded that the ESLs have been acceptably calculated. Therefore, these groundwater ESLs are appropriate for use as RAOs for this EE/CA. (c) The soil ESLs represent the lowest of levels based on odors, ecotoxicity, human health and protection of groundwater (Table A-1, SFRWQCB, December 2013. Therefore, a footnote should be added that the soil ESLs are not necessarily based only on protection of human health. (d) In addition, the human health levels listed in Table A-1 of the SFRWQCB document for shallow soil is based only on direct soil exposure and do not include consideration of the vapor intrusion pathway. Therefore, using these soil ESLs as RAOs may or may not show that risks to human receptors have been reduced to acceptable target levels after completion of the removal action. This should be so stated in the text.	We will edit the table to add the footnotes you suggest. With respect to RAOs, it is important to consider that this NTCRA is not the final remedy and the RAOs are not necessarily the final cleanup levels for the site. The groundwater RAO, for example, may not be protective for vapor intrusion. However, due to the high concentrations of VOCs in the source area, we are not certain we will be able to achieve a more stringent RAO using only thermal treatment. Following completion of the NTCRA, we will evaluate options for addressing residual contamination (e.g., enhanced natural attenuation) in a final cleanup process.
13	DTSC HERO Comment 6 pp.3	At the joint meeting on September 29, 2014, the DTSC recommended that a public health evaluation of remedial alternatives (HERA) be performed to evaluate the treatment alternatives. Since an alternative has been chosen in this EE/CA, the HERO recommends that a PHERA be performed to estimate the short-term and long-term risks and hazards that may be posed during the chosen remedial activity. This recommendation is made because of the elevated concentrations of VOCs in soil and groundwater on site, the proximity of residents and workers to the site and source area, and the potential that fugitive emissions from the treatment area could escape into the atmosphere and adversely affect ambient air quality. The HERO concluded that the risk evaluation is unacceptable. First, it does not accurately represent the risks and hazards posed by the chemicals of concern present on the site, because the most important complete exposure pathway has not been considered. Second, the risk evaluation does not include the information needed to determine if the evaluation was performed properly, as discussed in HERO comment 2 above.	The remedial action for the site will not be selected until the completion of the 30 day Public Comment Period. It would not be practical to prepare PHERAs for all of the alternative actions for inclusion in the EE/CA. Therefore, a PHERA will be prepared during the remedial design.
14	DTSC Officer of Engineering and Special Project Comment 1 pp.4	The first sentence in paragraph 5 of the executive summary (page ES-2) states that concrete thickness is one to four feet. However, the text in Section 2.1.4.3 states that concrete thickness varies from 6 inches to 3.5 feet. See also first sentence in third paragraph in Section 3.2 Conceptual Site Exposure Model. The text should be modified to indicate the correct thickness.	The text will be corrected.
15	DTSC	Section 2.1 Site Description, Operation and History. The third sentence states that the site is bordered by an industrial property on the south and by a parking lot on the east. However, the	The text will be clarified.

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	Officer of Engineering and Special Project Comment 2 pp.4	attached figures appear to indicate that the site is bordered by Mandela Parkway on the east and by 3rd Street on the south. The text should be corrected.	
16	DTSC Officer of Engineering and Special Project Comment 3 pp.4	Section 2.1.6 Sensitive Ecosystems. The second sentence states that the site is located 0.6 miles south of Oakland Inner Harbor. However, Figure 2-1 appears to indicate that the site is located north of the Inner Harbor. The text should be corrected.	The text will be corrected.
17	DTSC Officer of Engineering and Special Project Comment 4 pp.4	Section 2.3 Source, Nature and Extent of Contamination. The first sentence states that there are 200 chemicals of concern (COCs). However, the text in Section 2.1.3 Regulatory History (Federal, State, Local) and Past Response Actions on page 2-8 under 2011 EPA Remedial Investigation states that 98 COCs were identified. The text should be corrected to indicate the correct number of COCs or explain the numerical difference.	The text will be clarified.
18	DTSC Officer of Engineering and Special Project Comment 5 pp.4	Section 5.2 Determination of Removal Scope. The second paragraph states that, "Additional performance evaluation sampling is recommended to better define the extent of the source zone contamination prior to implementing the removal action". The report should be revised/ expanded to include a timeline when the recommended sampling will be performed and all related costs should be included in the cost estimate.	The document is referring to the bench test which will be performed during the remedial design. The text has been edited to clarify this effort.
19	DTSC Officer of Engineering and Special Project Comment 6 pp.4	Section 6.2.2 Effectiveness of Cleanup. The third sentence in the first paragraph states that the existing building cannot be removed. However, no reasons are included on why the building cannot be removed. The text should be revised to include reasons why the building cannot be removed, or if the building can be removed, the effectiveness of this alternative should be re-evaluated.	Removal of the warehouse/office building is not under consideration at this time.
20	DTSC Officer of Engineering and Special Project Comment 7 pp.5	Section 6.2.2 Effectiveness of Cleanup. The second sentence in the third paragraph states that over 600,000 gallons of heavily contaminated groundwater would be disposed of at an appropriate facility. It is not clear why a treatment process was not included to reduce the amount of contaminated groundwater requiring offsite disposal.	On-site treatment and disposal of groundwater would not be feasible or cost effective due to the large volume and short time period. In addition, discharge volume limitations by EBMUD would necessitate several large storage tanks on the Site, where space is limited.
21	DTSC Officer of Engineering and Special Project Comment 8 pp.5	Section 6.2.3 Implementability of Removal Technology. The text in the fifth paragraph states that excavation is a very loud, high impact technology, especially when sheet piles must be driven. However, we note that noise levels can be reduced significantly via vibro-placement of sheet piles. It may be more accurate to describe the removal technology as loud rather than very loud.	The word "very" will be removed from the text.

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22	DTSC Officer of Engineering and Special Project Comment 9 pp.5	Section 6.3.3 Implementability of Removal Technology. The text in the fifth paragraph states that costs would increase significantly if advance oxidation water treatment technology is required to remove 1,4-dioxane. However, it appears that such costs were not included in the cost estimate. These costs should be included for all alternatives where groundwater disposal to the sanitary sewer system may be required to provide a more complete evaluation.	EBMUD does not currently have a discharge limit for 1,4-dioxane (Audrey Comeaux, EBMUD email message to Dacre Bush OTIE, November 19,2014.
23	DTSC Officer of Engineering and Special Project Comment 10 pp.5	Section 6.4.1 Description of Process/Technology. The text in the fifth paragraph states that the site will be sealed with cellular concrete to provide thermal insulation, prevent vapor extraction short circuiting and prevent fugitive VOC emissions. Cellular concrete usually has higher porosity than regular concrete and or other sealing materials. The text should be expanded to include a rationale for using cellular concrete rather than other materials with better sealing capabilities.	The cellular concrete is closed cell and is specifically designed for use with ISH heating system. In addition to sealing the ground surface, the concrete provides a thermal barrier which improves system performance. The text has been edited to clarify the use of this material.
24	DTSC Officer of Engineering and Special Project Comment 11 pp.5	Section 6.4.1 Description of Process/ Technology. The text in the eighth paragraph does not address the presence of dioxins in the extracted materials and how they would be addressed. The text should be expanded to discuss how dioxins would be handled, especially if it is not permissible to re-inject untreated groundwater or dispose of it offsite.	We assume the reviewer is referring to 1,4-dioxane. The SFRWQCB does not require a permit for the re-injection of treated groundwater as part of a site specific groundwater cleanup project (Stephen Hill, SFRWQCB, email message to Lynn Suer, EPA, November 10, 2014). In addition, EBMUD does not currently have a discharge limit for 1,4-dioxane (Audrey Comeaux, EBMUD email message to Dacre Bush OTIE, November 19,2014.
25	DTSC Officer of Engineering and Special Project Comment 12 pp.5	Section 6.4.1 Description of Process/ Technology. The text in the ninth paragraph states that bench scale testing would be required to confirm the feasibility of ERH and for electrode and extraction well spacing design. It is not clear that bench scale testing would be sufficiently representative of field, especially boundary conditions. Pilot testing likely will be required, and should be included in the evaluation.	A further determination for the need of bench or pilot testing will be made during the pre-design phase,. However, only bench testing is recommended by ISH vendors. Pilot testing ISH is typically not cost feasible due to the need to construct the same above ground electrical infrastructure for a pilot as would be needed for full scale. In addition, the key input for ISH is soil conductivity and bench testing can provide sufficient data for this measurement.

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26	DTSC Officer of Engineering and Special Project Comment 13 pp.5	Figure 6-6 In-Situ Thermal Heating Process Diagram. It is likely that booster pumps will be required between the groundwater extraction/vapor recover well and the ERG condenser. The pumps should be included in the diagram and their costs added.	Specific treatment system components will be identified during the remedial design phase. The EE/CA gives examples of general system treatment processes, not specific design details.
27	DTSC Officer of Engineering and Special Project Comment 13 pp.5	Figure 6-6 In-Situ Thermal Heating Process Flow Diagram. It is likely that a continuous emission monitor will be required at the discharge to atmosphere point after the vapor-phase GAC vessels. The monitor should be added to the diagram and its cost added.	Specific treatment system components will be identified during the remedial design phase. Air monitoring will be conducted throughout the remedial action, and system components will be designed during the Remedial Design phase.
28	DTSC Gerard Aarons Comment 1 pp.2	Comment: The cost estimates provided in the EE/CA text, as well as Tables 6-1 through 6-5, need to include a cost contingency, based on the estimated level of detail provided in these designs, and an estimated percentage of design completion. Recommendation: Please revise the text and tables to include a cost contingency, based on the estimated level of detail provided in these designs, and an estimated percentage of design completion.	The EE/CA cost estimates have been edited to provide a more detailed breakout of costs. Percent complete will be tracked during the remedial action.
29	DTSC Gerard Aarons Comment 2 pp.1	Comment: *Alternative 4: In-Situ Thermal Heating (ISH*) is stated as the preferred NTCRA alternative. The ISH alternative acronym should also include the multi-phase extraction well system components (ISH/MPE). Recommendation: Please revise the EE/CA to show that the ISH alternative includes the MPE system component in its acronym (e.g., ISH/MPE).	Soil vapor and condensate extraction is an integral part of the ISH remedial treatment. ISH can't be performed without a soil vapor extraction system. Since the ISH acronym has already been presented to the community, we recommend remaining consistent to avoid confusion.
30	DTSC Gerard Aarons Comment 3 pp.1	Comment: *For Alternative 4 In-Situ Thermal Heating*, the text is not clear as to the expected daily hours of operation. Recommendation: Please revise the text to include the expected daily hours of operation	The system will operate continuously. The text has been modified to highlight the use of sound insulation if necessary.

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31	DTSC Gerard Aarons Comment 4 pp.2	Comment: *Alternative 4: In-Situ Thermal Heating* describes noise concerns during operation. Section 6.3.3 *Implementability of Removal Technology* states: "MPE equipment would generate considerable noise during operations, however this can be mitigated through the use of sound insulation enclosures." The noise may also create conditions for reduced hours of planned operation during a 24-hour time period. Recommendation: Please include costs associated with building sound insulating enclosures in the estimate. Since noise may create conditions for reduced hours of planned operation, please describe alternative daily operation schedules; include the scheduling options in the cost estimate; and evaluate potential impacts to the overall NTCRA completion schedule.	The cost of sound insulation was included in the cost estimate. The new cost estimate format shows the associated costs more clearly.
32	DTSC Gerard Aarons Comment 5 pp.3	Comment: *Alternative 4: In-Situ Thermal Heating* should include a section that briefly describes the post-NTCRA performance monitoring and the operations and monitoring (O&M) activities which will be used to demonstrate that the RAOs have been met and that the system is operating as expected. Recommendation: Revise the text to include a description of the post-NTCRA performance monitoring and O&M activities which will be used to demonstrate that the RAOs have been met and that the system is operating as expected.	Performance objectives and operations and maintenance requirements will be developed in the remedial design phase. The proposed RAOs are based on mass removal and will be one of several factors that will be used to determine if system performance goals have been met and when the NTCRA is complete.
33	DTSC Gerard Aarons Comment 1a pp.3	Comment: *Section 6.4 Alternative 4: In-Situ Thermal Heating. 6.4.1 Description of Process/Technology.* The overall lengths of the ISH electrodes being deployed were not provided. Recommendation: Please revise this section to include the overall length(s) of the ISH electrodes being deployed. State whether or not the electrodes span the depths of the Site's impacted areas.	The electrodes will likely range from 10 to 50 feet in length depending on their location in the treatment area, but final depths will be developed in the design phase. The text has been modified to add this information.

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34	DTSC Gerard Aarons Comment 1b pp.3	Comment: *Section 6.4 Alternative 4: In-Situ Thermal Heating. 6.4.1 Description of Process/Technology.* A bench-scale test is planned but no pilot-scale test has been included. Recommendation: Please provide an explanation as to why no pilot-testing being proposed.	A further determination for the need of bench or pilot testing will be made during the pre-design phase, however, only bench testing is recommended by ISH vendors. Pilot testing ISH is typically not cost feasible due to the need to construct the same above ground electrical infrastructure for a pilot as would be needed for full scale. In addition, the key input for ISH is soil conductivity, and bench testing can provide sufficient data for this measurement.
35	DTSC Gerard Aarons Comment 1c pp.3	Comment: *Section 6.4 Alternative 4: In-Situ Thermal Heating. 6.4.1 Description of Process/Technology.* The subsection *on Ability to Achieve Removal Action Objectives* states that ISH has the highest likelihood of achieving RAOs for soil and groundwater, as it addresses the vapor phase, the dissolved phase, and the adsorbed phase of the light non-aqueous phase liquid (LNAPL) and the VOCs across all depths of the entire treatment area. Recommendation: Please provide the depth of the entire treatment area.	Please refer to Figure 5-2, *Conceptual Site Model and Treatment Depth*s for this information.
36	DTSC Gerard Aarons Comment 1d pp.3	Comment: *Section 6.4 Alternative 4: In-Situ Thermal Heating. 6.4.1 Description of Process/Technology.* The subsection on *State Agency and Community Acceptance* states: "If groundwater containing 1,4-dioxane is not allowed to be re-injected on site, the extracted groundwater would either need to be treated using advanced oxidation or discharged to the sanitary sewer under a Special Discharge Permit from EBMUD." Recommendation: Please clarify whether or not the cost of advanced oxidation or Special Discharge Permit from EBMUD is included in the cost estimate.	The SFRWQCB does not require a permit for the re-injection of treated groundwater as part of a site specific groundwater cleanup project (Stephen Hill, SFRWQCB, email message to Lynn Suer, EPA, November 10, 2014). In addition, EBMUD does not currently have a discharge limit for 1,4-dioxane (Audrey Comeaux, EBMUD email message to Dacre Bush OTIE, November 19,2014.

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37	DTSC Gerard Aarons Comment 1a pp.4	Comment: TABLE 6.3 In-Situ Heating Cost Summary, Regarding the subsection on *State Agency and Community Acceptance*: It's unknown if the cost of advanced oxidation water treatment or a permit to discharge extracted groundwater to the sanitary sewer in the estimate. Recommendation: Include the cost of advanced oxidation water treatment or a permit to discharge extracted groundwater to the sanitary sewer in the estimate	The SFRWQCB does not require a permit for the re-injection of treated groundwater as part of a site specific groundwater cleanup project (Stephen Hill, SFRWQCB, email message to Lynn Suer, EPA, November 10, 2014). In addition, EBMUD does not currently have a discharge limit for 1,4-dioxane (Audrey Comeaux, EBMUD email message to Dacre Bush OTIE, November 19,2014.
38	DTSC Gerard Aarons Comment 1b pp.4	Comment: TABLE 6.3 In-Situ Heating Cost Summary, Regarding the subsection on *State Agency and Community Acceptance*: It's unknown if the Site has the necessary infrastructure to run the ISH/MPE system. Recommendation: Please explain current site conditions in terms of existing power supply infrastructure. Include the cost of Site upgrades necessary to bring power to the site, if needed.	Two potential power line drops were identified at the site and the voltage will be confirmed with PG&E during the remedial design.
39	DTSC Gerard Aarons Comment 1c pp.4	Comment: TABLE 6.3 In-Situ Heating Cost Summary, Regarding the subsection on *State Agency and Community Acceptance*: A considerable amount of power will be needed to operate the ISH/MPE system. It's unknown if the cost estimate includes the estimated cost of power to be consumed. Recommendation: Please explain if the current estimate includes the cost of power consumption to operate the ISH/MPE system	Electricity costs to operate the ISH system were included in the cost estimate.
40	DTSC Gerard Aarons Comment 1d pp.4	Comment: TABLE 6.3 In-Situ Heating Cost Summary, Regarding the subsection on *State Agency and Community Acceptance*: It is expected that ISH equipment will generate considerable noise during operation; however, noise can be mitigated through the use of sound insulating enclosures. Recommendation: Please explain if the current estimate includes the cost of installing sound insulating enclosures.	The system will operate continuously. The text has been modified to highlight the use of sound insulation if necessary.

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41	DTSC Gerard Aarons Comment 1e pp.4	Comment: TABLE 6.3 In-Situ Heating Cost Summary, Regarding the subsection on *State Agency and Community Acceptance*: Implementing ISH would present a number of safety and security concerns (e.g., equipment and materials could be subject to theft and vandalism). Recommendation: Please explain if the current estimate includes the cost of 24 hour security surveillance.	A detailed site security plan will be developed during the remedial design. Site fencing, 24 hour site security, and motion detectors and system shut-offs were included in the cost estimate.
42	DTSC Gerard Aarons Comment 1 pp.4	Comment: Figures The EE/CA should be revised to include cross-section figures showing the depths at which the ISH electrodes and, SVE components (e.g., extraction and injection wells) will be deployed in relation to the treatment zone and to the extent of impacted media. Recommendation: Include cross-section figures showing the depths at which the ISH electrodes, SVE, groundwater extraction, and injection wells will be deployed in relation to the treatment zone and to the extent of impacted media.	These design details will be developed during the remedial design phase.
43	DTSC Gerard Aarons Comment 2 pp.5	Comment: Figures: The EE/CA should include a schematic figure showing the Pacific Gas & Electric Company (PG&E) power grid with sources for 500 kV power supply to the site. Recommendation: Please include a schematic figure showing the PG&E power grid with sources for 500 kilovolt (kV) or 240 kV power supply to the site.	All utility requirements, including electrical service, will be identified during the remedial design phase.